



September 3, 2025

Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814

**Re: Ensuring Accessibility and Transparency in the November 4th
Special Election**

Dear Governor Newsom:

On behalf of the undersigned organizations, we write to urge you to work actively with all relevant state and local agencies to ensure that the administration of the scheduled November 4, 2025, statewide special election is fair, accessible, and reflects California's commitment to a more participatory democracy. As experts with decades of collective experience in this field, we offer the following set of recommendations to help protect underrepresented voters and promote a more inclusive electorate:

1. Work with the Secretary of State to minimize the number and scope of any SB 280 waivers granted to counties, and support elections officials who need assistance finding adequate voting locations.
2. Work with the Secretary of State to ensure that high-quality translations of the ballot label and title and summary are provided in all Section 203 and Section 14201 languages and published on the Secretary's website. Encourage the Secretary to consult with both county election officials and established language experts before finalizing these translations to minimize errors and improve accessibility.

3. Work with the Department of Finance and the Secretary of State to ensure that robust voter education and outreach is understood to be an “actual and reasonably necessary” cost of administering the November 4th election.
4. Work with the Legislature to restore the online public comment portal for the proposed congressional map, translate the map materials and portal into all covered Section 203 and Section 14201 languages, and make them more accessible for people with disabilities.

California has enacted a range of reforms over recent years to enhance equity and transparency in our democracy, and we are grateful to your Office for signing many of these reforms into law. Yet despite these improvements, California’s elections still do not accurately reflect the state’s population and continue to underrepresent communities of color, people with language or disability access needs, lower-income people, and new voters, in particular.¹ Further, studies have repeatedly shown that voter turnout decreases and voter disparities increase during off-cycle and special elections.² These concerns are exacerbated given the unusually short timeline given to prepare for the special election called for by SB 280 (Pellerin, 2025).

In preparing for the November 4th election, California can best meet these challenges by providing robust and diverse options for voters to cast their ballots, sufficient funding for targeted voter education and outreach, and meaningful opportunities for public engagement in the election administration process.

¹ See, e.g., Wilson & Woodson, *California's electorate doesn't reflect the state's diversity - It's time to fix that*, CalMatters (Sept. 15, 2023), <https://calmatters.org/commentary/2023/09/voter-registration-california-diversity/>.

² See, e.g., Brennan Center for Justice, *Growing Racial Disparities in Voter Turnout: 2008–2022* (March 2, 2024), <https://www.brennancenter.org/our-work/research-reports/growing-racial-disparities-voter-turnout-2008-2022>; Public Policy Institute of California, *Low-turnout Communities Have a Smaller Voice in California's Democratic Process* (Oct. 24, 2024), <https://www.ppic.org/blog/low-turnout-communities-have-a-smaller-voice-in-californias-democratic-process/>; Noble Predictive Insights, *Voter Turnout: On-Years v. Off-Years* (Updated June 25, 2024), <https://www.noblepredictiveinsights.com/post/voter-turnout-on-years-v-off-years>.

I. Support Expansive Opportunities for In-Person Voting.

Ensuring that California's rich diversity is reflected in the state's electoral turnout requires providing accessible ballot-return options that fulfill the needs of a broad range of voters. Although most Californians now vote using the ballots they receive by mail, many of our state's most underrepresented voters still need or prefer to vote in person. For instance, the Center for Inclusive Democracy found that in the 2024 General Election, Black and Latine voters, younger voters, and limited-English voters used in-person voting at notably higher rates compared to the overall voting population.³ Historically, these are also the communities that most frequently experience long lines at the polls.⁴ As your Office acknowledged during the height of the pandemic's social distancing measures in 2020, it is "essential to ensure that all Californians who may need access to in-person voting opportunities—including individuals with disabilities, individuals who speak languages other than English, individuals experiencing homelessness, and others who may find vote-by-mail less accessible than in-person voting—are able to access such opportunities and exercise their right to vote."⁵

Despite the critical importance of providing sufficient in-person voting options, SB 280 reduced the minimum number of voting sites that counties must provide for the November 4th election. For Voters Choice Act counties, SB 280 allows for the number of vote centers open on Election Day and the preceding weekend to be cut by two-thirds.⁶ Counties that use the traditional polling place model are generally permitted to include no more than 1,000 voters in each precinct; SB 280 allows for single precinct locations to be consolidated up to 10,000 voters each.⁷ SB 280 also allows counties to seek waivers of these requirements from the Secretary of State.⁸

³ *California's 2024 General Election: Voting Methods and Early Voting* (July 2025), 10-14, https://static1.squarespace.com/static/57b8c7ce15d5dbf599fb46ab/t/688dbdfd4a08101ae3691d8f/1754119684629/USC_CID_VotingMethods_Report_Final.pdf

⁴ Brennan Center for Justice, *Waiting to Vote* (June 3, 2020), <https://www.brennancenter.org/our-work/research-reports/waiting-vote#:~:text=10,in%20the%20best%2Dresourced%20counties>.

⁵ Governor's Exec. Order No. 67-20 (June 3, 2020), <https://www.gov.ca.gov/wp-content/uploads/2020/06/6.3.20-EO-N-67-20.docx.pdf>.

⁶ Cal. Elec. Code § 4005; Sen. Bill 280, 2025-2026, ch. 1.5 Cal. Elec. Code.

⁷ Cal. Elec. Code § 12223; Sen. Bill 280, 2025-2026, ch. 1.5 Cal. Elec. Code.

⁸ Sen. Bill 280, 2025-2026, ch. 1.5 Cal. Elec. Code.

While we understand that counties may find it challenging to secure their typical number of voting locations in the short time frame between the passage of SB 280 and the November 4th election, we are concerned that reducing in-person voting options will deepen representation disparities, create long lines on Election Day, and dampen overall participation.

Recommendation:

We therefore urge your Office to work with the Secretary of State to minimize the number and scope of any waivers granted to counties, as well as support elections officials who need assistance finding adequate voting locations. For example, support from the Governor's Office could help counties secure voting locations in state colleges or state government buildings.

II. Promote Representation for Voters of All Language Backgrounds.

Administering a fair and representative election also requires meeting the diverse language needs of our state's voters. According to the last U.S. Census, more than 6.5 million Californians have "limited English proficiency" (LEP). As experts have identified, "California's two fastest-growing populations—Asian Americans and Latinos—are also the groups most likely to speak English less than very well and the least likely to vote."⁹ As a recent study underscored, providing election materials—especially votable ballots—in-language is "essential" for California's LEP voters.¹⁰

For most California elections, the Secretary of State translates ballot titles and summaries for state measures when a county is covered by Section 203 of the federal Voting Rights Act, and county elections officials translate local ballot questions and other elections materials into languages covered by Section 203 and provide translated facsimile "sample" ballots and translated instructions in additional languages covered by California Elections Code Section 14201.

⁹ California Language Access Workgroup, *Breaking Barriers to the Ballot Box: Expanding Language Access for California Voters* (Sept. 26, 2023), 3, <https://www.commoncause.org/california/wp-content/uploads/2025/07/Breaking-Barriers-to-the-Ballot-Box-2023-with-Appendix.pdf>.

¹⁰ Asian Law Caucus et al., *Forging Ahead: Community Voices and the Impact of Language Access in the Electoral Process* (Aug. 25, 2025), 33-34, <https://www.asianlawcaucus.org/news-resources/guides-reports/forging-ahead-report-2025>.

For the November special election, SB 280 instead requires that “if a city, county, or city and county is required to provide a translation of ballot materials in a language other than English, the Secretary of State shall provide a translation of the ballot title and summary and the ballot label for” Proposition 50.¹¹ This means that the Secretary must provide these translations in all Section 203 and Section 14201 languages covered across the state.

On Sunday, August 31, 2025, the Secretary’s Office published a memorandum on its website that provided translated ballot language in the following languages: Chinese (traditional), Hindi, Japanese, Khmer, Korean, Spanish, Tagalog, Thai, and Vietnamese.¹² The Secretary determined in 2022 that 27 non-English languages are covered in specific precincts across California.¹³ The memorandum published on August 31st clearly falls short of providing translations for all 27 languages and, specifically, appears to omit translations covered under Section 14201 alone.

Recommendation:

We urge your Office to work with the Secretary of State to ensure that it provides high-quality translations in all Section 203 and Section 14201 languages and that these translations will be published in a location on the Secretary’s website that is easily accessible to both elections officials and the public. Further, although not required under SB 280, we strongly recommend that you encourage the Secretary to consult with both county election officials and established language experts before finalizing the translated versions of the ballot title and summary, as well as the ballot label, to minimize errors and improve accessibility.

III. Provide Funding for Adequate Outreach and Education.

California’s electoral disparities are a result of not only practical barriers to registering and casting a ballot, but also inadequate and unequal availability of reliable, plain-language election information. These disparities have consistently been greater during off-cycle elections, emphasizing the critical importance of

¹¹ Sen. Bill 280, 2025-2026, ch. 1.5 Cal. Elec. Code.

¹² County Clerk/Registrar of Voters (CC/ROV) Memorandum # 25080, <https://elections.cdn.sos.ca.gov/ccrov/2025/august/25080mb.pdf>.

¹³ CC/ROV # 22039 (March 1, 2022), <https://elections.cdn.sos.ca.gov/ccrov/2022/march/22039sr.pdf>.

robust voter education and outreach for every election.¹⁴ However, California has historically provided very little funding for voter education and outreach, with budget allocations fluctuating significantly between elections. Yet when tens of millions of dollars were allocated during the COVID-19 pandemic to support the education work of elected officials, it paid off—the state saw record voter turnout and some closing of turnout gaps. When voter education funding waned again in 2022, so did participation.¹⁵

Especially given the unexpected nature of this special election and the short timeline for voters to familiarize themselves with the potentially confusing ballot question being put before them, it is vital that California provide ample funding for voter education and outreach efforts at both the state and county levels. SB 280 allocates funding for the “actual and reasonably necessary” costs of the November special election and requires any savings to be rolled over to future elections.¹⁶

Recommendation:

We urge your Office to work with the Department of Finance and the Secretary of State to ensure that elections officials receive funding to cover all “actual and reasonably necessary” costs, including funding for robust education and outreach to inform voters about the rapidly-approaching November special election. These outreach efforts must include varied, in-language messaging targeted toward engaging underrepresented communities, such as by partnering with ethnic media outlets.

¹⁴ See, e.g., Mindy Romero, *California needs to step up funding for voter education and outreach*, CalMatters (June 10, 2022), [https://calmatters.org/commentary/2022/06/california-needs-to-step-up-funding-for-voter-education-and-outreach/#:~:text=In%20the%202020%20general%20and,%2DHispanic%20whites%20\(19.6%25\).](https://calmatters.org/commentary/2022/06/california-needs-to-step-up-funding-for-voter-education-and-outreach/#:~:text=In%20the%202020%20general%20and,%2DHispanic%20whites%20(19.6%25).)

¹⁵ “Compared to the 2020 general election, the Latino eligible voter turnout gap was more pronounced in 2022 at 12.9 percentage points (compared to 6.4 in 2020), and the Asian-American turnout gap likewise increased from 1.7 to 2.6 percentage points.” Center for Inclusive Democracy, *Voter Turnout in California: Challenges and Opportunities for Mobilization: Key Facts* (Sept. 2024), 2, https://static1.squarespace.com/static/57b8c7ce15d5dbf599fb46ab/t/66d64acdcbc8ac30ab695187/1725319886004/USC_CID+CAVoterTurnout_Brief_Final.pdf.

¹⁶ Sen. Bill 280, 2025-2026, ch. 1.5 Cal. Elec. Code.

IV. Support Future CRCs by Fostering Meaningful Public Participation.

Building a more expansive and inclusive democracy requires protecting the right of the public to meaningfully participate in decisions about how their government works, while also rigorously upholding government transparency standards. When it comes to decennial redistricting, California models both of these principles through its Citizens Redistricting Commission (CRC). The CRC uses public comment as one of its primary tools in drawing new district lines, and providing expansive opportunities for Californians to submit specific feedback on the congressional map being put before voters on November 4th would be invaluable to future CRCs.

We support the Legislature's decisions to make the [proposed congressional map](#) referenced in Proposition 50 public and to accept public comment on the map through an [online portal](#). However, as of the date of this letter, the online portal appears to have been closed. Further, the map materials and the portal were initially only available in English and not in a format accessible to people with certain disabilities.

Recommendation:

We urge your Office to work with the Legislature to re-open the online portal for public comment on the proposed congressional map and keep it open through November 4th, translate the map materials and portal into all covered Section 203 and Section 14201 languages, and make both more accessible, including by providing them in large print and audio or screen-reader compatible formats.

* * *

As you are aware, it is essential that your Office move quickly to meet the urgency of the moment. Elections officials will begin mailing ballots to registered voters in early October. We would appreciate an opportunity to discuss the above recommendations with your office further, and we request a meeting with Brady Borcharding and Dave Sapp. Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brittany' followed by a stylized surname.

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